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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Federal Defendant United States of America respectfully requests this Court enter a stay of all proceedings and deadlines, including all motion and discovery deadlines, until November 19, 2018, in order to allow the parties to finalize the terms of a settlement agreement and to execute and enter a Stipulation to Dismiss with Prejudice. Plaintiff does not oppose this request.

In support of this motion, the United States submits as follows:

1. The parties have been engaged in settlement negotiations and have recently agreed in principal to a compromise settlement which will resolve all outstanding claims between the parties. Documents supporting this settlement are being prepared and the parties expect that the matter will be concluded within the next month.

2. Courts have broad discretion to stay proceedings for a limited time. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254-55 (1936); *see also Clinton v. Jones*, 520 U.S. 681, 706 (1997) (courts have broad discretion in the management of cases, including the setting of cases for trial).

1 3. The instant motion is filed in good faith and not for the purposes of delay.
2 4. If the matter is not concluded by November 19, 2018, the parties will file a status
3 report advising of reasons that it is not concluded.

4 For the above reasons, the United States respectfully requests this Court stay the
5 proceedings and deadlines in this matter until November 19, 2018.

6 Respectfully submitted this 16th day of October 2018.

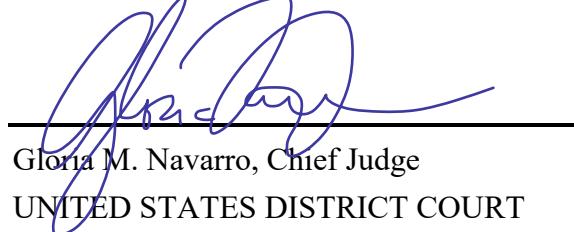
7 DAYLE ELIESON
8 United States Attorney

9 */s/ Lindsy M. Roberts*
10 LINDSY M. ROBERTS
11 Assistant United States Attorney

12 *Attorneys for the United States*

13 **IT IS SO ORDERED.**

14 **DATED** this 18 day of October, 2018.



15
16 Gloria M. Navarro, Chief Judge
17 UNITED STATES DISTRICT COURT

22 **PROOF OF SERVICE**

23 I, Lindsy M. Roberts, certify that all parties were served with the **UNOPPOSED**
24 **MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT** on
25 this date via the Court's Electronic Case Filing system.

26 Dated this 16th day of October 2018.

27 */s/ Lindsy M Roberts*
28 LINDSY M. ROBERTS
 Assistant United States Attorney